



November 11, 2016

Boulder Valley School District - Petition Support Letter Proceedings: 02-6, 10-90, 12-184

Personally by administrators at the Adams 12 Five Star School District, Colorado

October 31, 2016

This comment of the signators below is provided herein in support of the petition filed by Boulder Valley School District (BVSD) to waive Federal Communications (FCC) rule 47 C.F.R. § 54.504(e) under 47 C.F.R. § 1.3 to more accurately reflect cost to the Universal Service Fund while better serving students negatively impacted by the "Homework Gap" when school districts move to a digital learning.

As K12 education in the United States moves toward digital curriculum, interactions, and resources, the Homework Gap has already become a significant challenge facing many school districts, including Adams 12 in Colorado. Because even low monthly fees can deter low income families from purchasing or consistently continuing the necessary broadband access to the Internet to support proper student engagement in curricular materials and research, this problem is likely to get worse as school districts rely more and more on digital curriculum and other forms of digital engagement in the learning process.

Given the inequity that this Homework Gap is creating, Adams 12 supports BVSD in petitioning for an exception that addresses this challenge in a focused way with a well-bounded scope. It directly takes on eliminating the recurring costs that are likely to be pinched when families face hard financial choices, while focusing on the housing areas where this issue is most likely to occur. The BVSD petition also does this in a way that can make a clear example of how to accomplish this in areas across the nation where children might be particularly disadvantaged by the move to a digital curriculum.

As a team working on what is a broad challenge, we hope to learn from the BVSD case as they discover the short and long-term impact of making broadband highly accessible to those most likely impacted by the nation's move towards digital curriculum as we look for ways to limit the digital divide. This learning is likely to happen more rapidly and effectively with the support of the partnership with the Samuelson-Glushko Technology Law and Policy Clinic. We support the assertion that this is sufficient cause to justify the waiver.

In our opinion, the exception as a change to current code would further the educational goals of many school districts, including our own. These include:

- Providing specific services to students in distressed situations through public-private partnerships like the BVSD model.
- Engaging in intergovernmental agreements to reduce construction costs of regional fiber networks without having to incur financial penalties for an exchange of strands between government entities that would both save USAC cost and help USAC accomplish it's mission objectives.

If there is anything we can do in support of the Boulder Valley School District's petition, please do not hesitate.

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